



United States
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How to Develop A Meat and Poultry Product Recall Plan



Food Safety and Inspection Service

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Small Plant News Guidebook Series



Small Plant News is a monthly four-page newsletter published by the U.S. Department of Agriculture's (USDA), Food Safety and Inspection Service (FSIS). It is targeted to small and very small Federal- and State-inspected establishment owners and operators who produce meat, poultry, and processed egg products.

Small Plant News' mission is to support FSIS' Strategic Implementation Plan for Strengthening Small and Very Small Plant Outreach by providing pertinent information to plant owners and operators so they can produce safe food and, ultimately, ensure the success of their livelihoods. The newsletter strives to do this through:

- ✓ Informing and educating small and very small plant owner/operators on FSIS news with meaningful and coherent information in an easy-to-read format.
- ✓ Assisting plant owners and operators on implementing FSIS rules and regulations into their daily operational practices with "plain language" information.
- ✓ Fostering small and very small plants' ability to stay in business and produce the safest food by providing essential tips that will encourage the highest sanitation standards, paperwork compliance, and cost-saving measures.
- ✓ Honoring FSIS' obligations to small and very small plants by providing a mechanism that increases a two-way dialogue between plants and the agency.

Back issues of *Small Plant News* are available on FSIS' Web site at www.fsis.usda.gov. You may also call the Small Plant Help Desk at (877) 374-7435 or e-mail InfoSource@fsis.usda.gov to order back copies.



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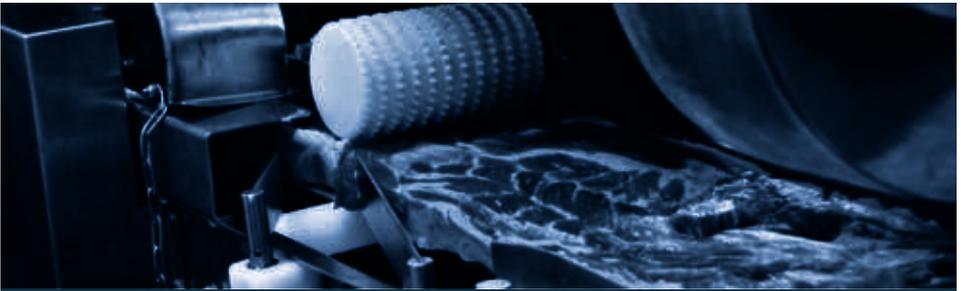


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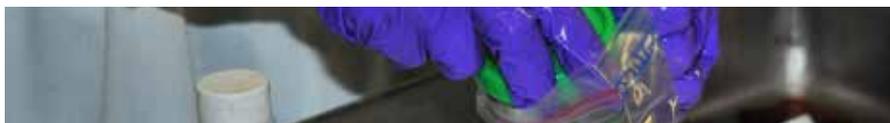
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Introduction

Recalls. A recall is a voluntary action conducted by a firm to remove adulterated or misbranded meat and poultry products from commerce. Although it is your company's decision to recall a product, the Food Safety and Inspection Service (FSIS), the public health regulatory agency within the United States Department of Agriculture (USDA), coordinates with you to ensure that you have properly identified and removed recalled product from commerce by verifying the effectiveness of your recall activities. FSIS also notifies the public about product recalls.

There are three levels of meat and poultry recalls categorized by FSIS. The type of recall depends upon the potential risk to consumers.

◇ **Class I.**

There is a reasonable probability that eating the product will cause serious, adverse health consequences or death. Examples of a Class I recall include

the presence of pathogens in ready-to-eat meat or poultry products or the presence of *E. coli* O157:H7 and other shiga-toxin producing *E. coli* O157:H7 or non-O157 STEC in raw ground beef.

◇ **Class II.**

There is a remote probability of adverse health consequences if the product is eaten. Examples of a Class II recall include the presence of very small amounts of undeclared allergens typically associated with milder human reactions, e.g., wheat or soy, or small-sized, non-sharp-edged foreign material in a meat or poultry product.

◇ **Class III.**

Eating the product will not cause adverse health consequences. An example of a Class III recall is the presence of undeclared ingredients, such as excess water in meat or poultry products.

How to Develop A Recall Plan



A recall may be an alternative to FSIS detaining or seizing adulterated or misbranded products. However, if firms do not adequately remove a recalled product from commerce, a recall does not prevent FSIS from taking other appropriate actions, such as issuing public health alerts or detaining or seizing product to protect the public.

The agency will also assess whether your recall strategy, or execution of that strategy, is effective. If it finds it is ineffective, FSIS may seek to bring an enforcement action against you or your consignees.



Recall Plans

Title 9 of the Code of Federal Regulations, Part 418 (9 CFR 418), requires that official establishments that produce meat and poultry products prepare and maintain written recall plans. Effective dates for the regulations in § 418.3 are applicable as follows:

- ◇ In small *establishments*, defined as all establishments with 10 or more employees but fewer than 500, **May 8, 2013.**
- ◇ In *very small establishments*, defined as all establishments with fewer than 10 employees or annual sales of less than \$2.5 million, **May 8, 2013.**

Under these regulations, your plan must specify how you will decide whether to conduct a product recall and describe the procedures you will follow if you decide that a product recall is necessary. In addition, the regulations require that your plan be available to the FSIS inspector for review upon request.

FSIS recommends that processed egg products plants also develop and maintain recall plans, although they are not explicitly required to do so by the regulation.

FSIS has developed this guidebook and workbook to aid small and very small establishments that produce meat or poultry products in creating their recall plans. The following information can be used to design and implement an effective recall plan.



Recall Team. Your recall plan should contain a list of all your internal and external personnel who will be involved in a product recall. Include their roles and responsibilities, telephone numbers, fax numbers, and e-mail addresses. Be sure to appoint backups for each person.

One person should be identified as the “recall coordinator.” This person may use another title, but the idea is to have one person in charge of recalls and recall planning. The recall coordinator will manage, maintain, and make changes to the recall plan as necessary.

The recall coordinator should be knowledgeable about every aspect of the firm’s operations, including purchasing, processing, quality assurance, distribution, and consumer complaints. The recall coordinator should be authorized to make decisions in carrying out a recall and should report to top management at regular, specified intervals.

FSIS District Office. Your recall plan should include the telephone number of your local FSIS District Office. If you believe, or have reason to believe, that you have shipped adulterated or misbranded meat or poultry product into commerce, you are required to notify your local FSIS District Office within 24 hours. In addition, you must notify your local FSIS District Office if you believe that you have received adulterated or misbranded product, in accordance with 9 CFR 418.3.



Procedures for Determining a Recall

Health Hazard Evaluation. Your plan must specify a method for determining how you will decide whether to conduct a recall if your product is adulterated or misbranded and is in commerce. Evaluating the nature and extent of the health risks associated with the product is one method for doing so. If you choose to assess the health hazards, you should take the following into account:

- ◇ Whether any illness or injuries have already occurred from eating the product;
- ◇ What hazards target various segments of the population, (e.g., children, the elderly, immune-compromised individuals, etc.), with particular attention paid to those individuals at greatest risk;
- ◇ How serious is the health hazard to which the at-risk population would be exposed;
- ◇ How likely is the hazard to occur; and
- ◇ What would happen if it did.

Here are some examples that you may want to consider when developing your recall plan. This list is not all inclusive, but it will help stimulate your thinking.

- ◇ Undeclared allergen – What health hazards may arise if product shipped from your plant containing an undeclared allergen is consumed?
- ◇ Consumer complaints – What are the health hazards if you receive a consumer complaint about a foreign material such as glass or metal in the product that has been shipped from your establishment?
- ◇ Underprocessing – What are the health hazards if you discover that some of the products have been underprocessed? If your plant produces ready-to-eat product and raw product, will the hazards for these be different?



- ◇ Raw non-intact beef tests positive for *E. coli* O157:H7 or non-O157 STEC (both plant and FSIS test)
- ◇ Ready-to-eat product tests positive for any pathogen (both plant and FSIS test)

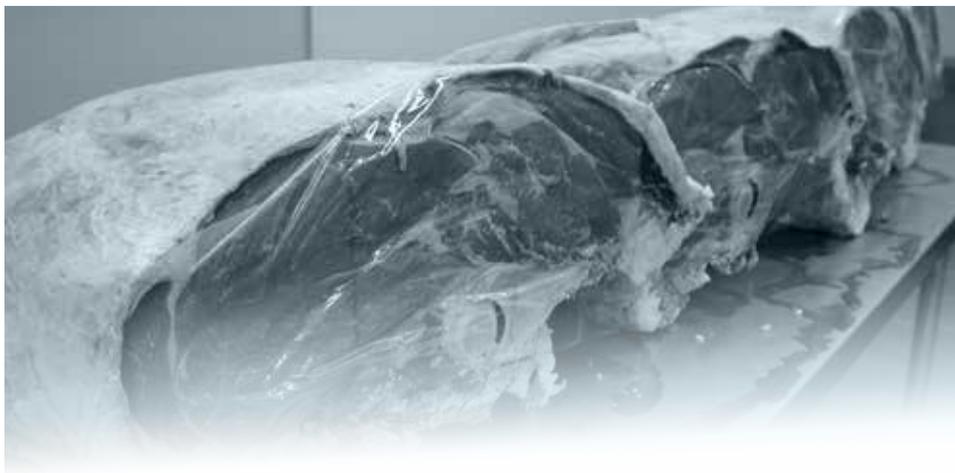
Scope of Recall.

Your plan should also outline how you will determine the identity and amount of product to be recalled. It will be your responsibility to define when the problem began, when it was resolved, and what products are affected. Clean-up times do not necessarily define the scope of a recall.

FSIS suggests that your plan specify how you will determine the amount of product affected by using various scenarios. Scenarios can include: the contamination of a vat of product with a foreign object, the use of an incorrect label, or the use of the same source of raw materials in other lots on other days of production.

When determining the amount of product affected, consider the following:

- ◇ Your coding of product;
- ◇ The pathogen of concern;
- ◇ The processing and packaging;
- ◇ The equipment;
- ◇ The Hazard Analysis and Critical Control Point (HACCP) monitoring and verification activities (including microbiological testing) that you perform;
- ◇ Your Sanitation Standard Operating Procedure (SSOP) records; and
- ◇ Whether some, or all, of the products controlled by the same or substantially similar HACCP plans have been affected.



Records.

Records are vital in tracing product forwarded to consignees and back to potential suppliers. They include invoices, bills of sale, and shipping documents from each transaction in which product made with meat or poultry is purchased, sold, shipped, received, or handled by your plant in connection with any business subject to the Federal Meat Inspection Act or the Poultry Products Inspection Act. HACCP system records may also play a part in this process. Records you should have on hand include:

- ◇ Records needed to permit positive identification of products produced;
- ◇ Production records, including records on ingredients that are essential for traceback of products and ingredients of the products. All products need a system of product coding; this coding will facilitate an effective recall. Records of raw materials used in each lot of ground beef are especially important. Both you and public health authorities need to know if the problem is traceable to a supplier (refer to 9 CFR 320 and 9 CFR 381, subpart Q);



- ◇ Distribution records that identify and locate shipped products that are recalled. These records should include at least the names and addresses of consignees, shipment method, date of shipment, and the amount of product shipped to each consignee. It is also useful to note which consignees are hospitals, restaurants, distributors, part of a chain, or independent retailers.

Here's a practical example. If a recall of product is necessary because of contamination with *Listeria monocytogenes*, then a key factor in limiting the scope of the recall is whether the establishment (or retail store) is properly cleaning the equipment between lots. If not, there could be microbial contamination from one lot to another.

Carefully maintained production records serve a vital public health purpose by giving the establishment and agency a means of pinpointing potential sources of contamination and providing greater accuracy in determining which products may be affected.

Records that help product traceback:

- ◇ Production or grinding logs showing the times of each grind;
- ◇ Formulation or blend of raw ingredients, including amounts;
- ◇ Supplier lot identification;
- ◇ Finished product lot and subplot identification; and
- ◇ Any test results associated with either the raw materials or finished product.

The records should indicate and track which lots or sublots of a grinding establishment's ground beef, including rework, and any other raw materials were used. The records should also track the amounts of each that were used.

Recall Communications

Recall Notice. FSIS recommends that your recall plan include an outline of the content of your recall notice. Please see sample recall notices on pages 16-18. When drafting the content of your recall notice, consider the following:

- ◇ Be brief and to the point;
- ◇ Clearly identify the product and any other pertinent descriptive information to enable accurate and immediate identification of the product, including:
 - » Product/brand name;
 - » Product code;
 - » Package/case size;
 - » Package/case date code;
 - » Lot number/expiration date; and
 - » Universal Product Code.
- ◇ Provide an explanation of the risk if the product is eaten;
- ◇ Concisely explain the reason for the recall and the hazard involved;
- ◇ Provide specific instructions on what should be done with the recalled products;
- ◇ Request an official, written response from consignees;
- ◇ Provide a way for the recipient of the communication to report to the recalling firm whether it has any of the product, e.g., by allowing the recipient to place a collect call to the recalling operation;
- ◇ The recall communication should not contain irrelevant qualifications, promotional materials, or any other statement that may detract from the message; and
- ◇ Provide contact information for your firm (for questions).

Your plan should also detail how the recall notification will be issued. For example, you can send your recall notice by e-mail, telephone, or



fax. Written notices should bear a prominent heading to indicate the importance of the communication. For example, a letter might bear a bold red declaration, such as “URGENT FOOD RECALL.” If communication is conducted by telephone, you should document and send a followup letter, e-mail, or fax to ensure that all bases are covered.

Public Notification. FSIS recommends that you identify if and how the public will be notified of the recall. Recalls are often announced via a press release through national or local news media, or via a company website. Be sure to include contact information for all potential media, such as television stations, radio stations, and newspapers with local, State, and regional coverage areas, as well as the national wire services. If the actual contacts are not specified, then reference sources of current media contacts for all possible recall scenarios should be specified in the recall plan.

The class of the recall and where the product was distributed will determine the type of notification you will use. Generally, distribution levels are categorized as wholesale, retail, hotel/restaurant/institutional (HRI) and consumer users. The more levels affected, the greater the need for different communication methods.

At the **wholesale level**, the product is distributed to a warehouse or distribution center. This is the distribution level between the manufacturer and retailer.

The **retail level** is when the product is received by the retailers for sale to the public.

The **HRI level** is when the product was received by hotels, restaurants, or institutional customers.

Lastly, the **consumer level** is when the product is sold directly to consumers.

Regardless of the public notification action you take, FSIS will issue a press release for Class I and Class II recalls. FSIS will issue a Recall Notification Report if the recalled product has only been distributed at the wholesale level (and your firm is able to gain control of the product before it can be further distributed to the retail, HRI, or consumer level) and for Class III recalls. A Recall Notification Report is not distributed to the media.

Control and Disposition of Returned Product

Your recall plan should specify how the recalled product will be controlled pending disposition and disposal. If it will be destroyed after being returned, then notify FSIS prior to destroying the product in the event witnessing the product destruction is necessary.

Recall Simulations

The best way to test the effectiveness of your recall plan is to conduct a recall simulation that will help you identify any glitches in your recall plan. For example, you might find that a key fax or telephone number of a distributor or supplier has changed. Simulating a recall will keep your recall personnel alert and will familiarize everyone with recall procedures.

A simulation will determine how quickly your company can identify and control a lot of affected product. If problems are identified during a recall simulation, then the recall plan should be revised and corrected. Simulations are necessary, and your recall plan will falter without them.

If you follow these guidelines, then you and your establishment should be ready in the event of a recall. Having a plan, familiarizing everyone with it, and implementing its procedures will keep you in control.

Sample Recall Notices and Notification Letter and Worksheets.

On pages 16-19, you will find sample Recall Notices and a Notification letter. You may use these as templates when designing your own Recall Notices and Notification Letters. On pages 20-24, you will find recall worksheets. You may use these for collecting pertinent information during a recall. In addition, a Recall Plan Workbook has been added to help you create a recall plan. The workbook can be found on pages 25-48.

If you have any questions or concerns about developing your recall plan or need additional resources, contact FSIS' Office of Outreach, Employee Education and Training through the Small Plant Help Desk at 1-877-FSISHelp (1-877-374-7435) or e-mail InfoSource@fsis.usda.gov.

Also, visit the Small and Very Small Plant Web page at www.fsis.usda.gov to obtain information on training, workshops, and technical information to suit your needs. For additional information, you can also access FSIS Directive 8080.1, Recall of Meat and Poultry Products, from FSIS' Web site at www.fsis.usda.gov/OPPDE/rdad/FSISDirectives/8080.1.pdf.

All information from this brochure is derived from FSIS Directive 8080.1.



SAMPLE RECALL NOTICE: May Contain GLASS, PLASTIC, ETC.

[STATE] FIRM RECALLS [PRODUCT] THAT MAY CONTAIN [GLASS, PLASTIC, ETC.]

[CITY], [DATE] – [COMPANY], an [CITY, STATE], establishment, is recalling approximately [AMOUNT] pounds of [PRODUCT] that may contain pieces of [SPECIFY MATERIAL], [FIRM NAME].

The following products are subject to recall:

[IDENTIFYING INFO: TYPE OF CONTAINER, WEIGHT, “BRAND NAME AND OTHER LABEL INFORMATION,” ESTABLISHMENT NUMBER, CASE AND/OR DATE CODES]

The products were produced on/from [DATE] and distributed to [LEVEL OF DISTRIBUTION, i.e., RETAIL ESTABLISHMENTS, INSTITUTIONS, ETC.] in [STATES].

The problem was discovered through [SPECIFY HOW PROBLEM WAS DISCOVERED]. There have been [# or NO] reports of injury from the consumption of these products. Anyone concerned about an injury from the consumption of the products should contact a physician.

Consumers with questions about the recall may contact [CONTACT TITLE AND NAME] at [TELEPHONE NUMBER]. Media with questions about the recall may contact [CONTACT TITLE AND NAME] at [TELEPHONE NUMBER].

SAMPLE RECALL NOTICE: *LISTERIA*

[STATE] FIRM RECALLS [PRODUCT] DUE TO POSSIBLE *LISTERIA* CONTAMINATION

[CITY], [DATE] – [COMPANY], an [CITY, STATE], establishment, is recalling approximately [AMOUNT] pounds of [PRODUCT] that may be contaminated with *Listeria monocytogenes*].

The following products are subject to recall:

[IDENTIFYING INFO: TYPE OF CONTAINER, WEIGHT,
“BRAND NAME AND OTHER LABEL INFORMATION,”
ESTABLISHMENT NUMBER, CASE AND/OR DATE CODES]

The products were produced on/from [DATE] and distributed to [LEVEL OF DISTRIBUTION, i.e., RETAIL ESTABLISHMENTS, INSTITUTIONS, ETC.] in [STATES].

The problem was discovered through [SPECIFY HOW PROBLEM WAS DISCOVERED]. There have been [# or NO] reports of illness associated with the consumption of these products.

Consumption of food contaminated with *Listeria monocytogenes* can cause listeriosis, an uncommon, but potentially fatal disease. Healthy people rarely contract listeriosis. However, listeriosis can cause serious and sometimes fatal infections in those with weak immune systems, such as infants, the elderly, pregnant women and persons with human immunodeficiency virus (HIV) infection or undergoing chemotherapy. Symptoms include high fever, severe headaches, neck stiffness, nausea, confusion, and convulsions.

Consumers with questions about the recall may contact [CONTACT TITLE AND NAME] at [TELEPHONE NUMBER].
Media with questions about the recall may contact [CONTACT TITLE AND NAME] at [TELEPHONE NUMBER].



SAMPLE RECALL NOTICE: UNDECLARED ALLERGEN

[STATE] FIRM RECALLS [PRODUCT] DUE TO UNDECLARED ALLERGEN

[CITY], [DATE] – [COMPANY], an [CITY, STATE], establishment, is recalling approximately [AMOUNT] pounds of [PRODUCT] due to an undeclared allergen [SPECIFY ALLERGEN].

The following products are subject to recall:

[IDENTIFYING INFO: TYPE OF CONTAINER, WEIGHT, “BRAND NAME AND OTHER LABEL INFORMATION,” ESTABLISHMENT NUMBER, CASE AND/OR DATE CODES]

The products were produced on/from [DATE] and distributed to [LEVEL OF DISTRIBUTION, i.e., RETAIL ESTABLISHMENTS, INSTITUTIONS, ETC.] in [STATES].

The problem was discovered through [SPECIFY HOW PROBLEM WAS DISCOVERED]. Anyone concerned about an allergic reaction should contact a physician.

Consumers with questions about the recall may contact [CONTACT TITLE AND NAME] at [TELEPHONE NUMBER]. Media with questions about the recall may contact [CONTACT TITLE AND NAME] at [TELEPHONE NUMBER].

SAMPLE RECALL NOTIFICATION LETTER

[DATE]

[CUSTOMER FIRM NAME and ADDRESS]

ATTN: [CONTACT PERSON NAME and TITLE]

Re: [RECALL OF TYPE OF PRODUCT]

Dear Sir or Madam:

This letter is to confirm our telephone conversation that [Company Name] is recalling the following product because [Specify Recall Reason]:

[Describe the product, including name, brand, code, package size and type, establishment number, etc.]

We request that you review your inventory records and segregate and hold the above product. If you have shipped any of this product, then we request that you contact your customers and ask them to retrieve the product and return it to you. Once you have retrieved all of the product, please contact us. We will arrange to have the product shipped to our facility. Please do not destroy the product. We will credit your account for any product returned.

We are undertaking this action in cooperation with the Food Safety and Inspection Service (FSIS) of the U.S. Department of Agriculture. FSIS officials may contact you to confirm that you have received this notice and are cooperating in this action.

Your prompt action will greatly assist [Company Name] in this action. If you have any questions, please do not hesitate to contact [Company Recall Coordinator] at [Telephone Number].

Thank you for your cooperation.

Sincerely,

[Company Official Name] and [Title]

How to Develop A Recall Plan



RECALL WORKSHEET

(Include attachments, additional pages, label copies and flowcharts as necessary)

TODAY'S DATE: _____

ESTABLISHMENT NUMBERS: EST. _____ P- _____

ESTABLISHMENT NAME: _____

ADDRESS: _____

COMPANY RECALL COORDINATOR (name, title, telephone) _____

COMPANY MEDIA CONTACT (name, title, telephone) _____

COMPANY CONSUMER CONTACT (name, title, telephone) _____

REASON FOR RECALL: _____

IDENTIFY RECALLED PRODUCTS SEPARATELY BY:

BRAND NAME			
PRODUCT NAME			
PACKAGE (Type & Size)			
PACKAGE CODE (Use By/Sell By)			
PACKAGING DATE			
CASE CODE (Identifying)			
COUNT/CASE			
PRODUCTION DATE			
AMOUNT (lbs./cases) PRODUCED			
AMOUNT HELD AT ESTABLISHMENT			
AMOUNT (lbs./cases) DISTRIBUTED			
DISTRIBUTION LEVEL (institutional/retail/etc.)			
DISTRIBUTION AREA			
EXPORTED TO (country)			
SCHOOL LUNCH (CN, AMS Contract)	(YES) (NO)	(YES) (NO)	(YES) (NO)
DEPT. OF DEFENSE (DSCP, Commissary, etc.)	(YES) (NO)	(YES) (NO)	(YES) (NO)
INTERNET OR CATALOG SALES	(YES) (NO)	(YES) (NO)	(YES) (NO)



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RECALL WORKSHEET

DESCRIBE THE PRODUCTION/PROCESSING OPERATION AND/OR ATTACH A PROCESS FLOW DIAGRAM: _____

WHAT WERE THE "CLEAN-UP TO CLEAN-UP" TIMES (where applicable)? _____

HAS THE SOURCE OF THE CONTAMINATION BEEN IDENTIFIED? EXPLAIN: _____

ARE THERE DATA THAT COULD LIMIT THE AMOUNT OF PRODUCT AFFECTED? (YES) (NO)
EXPLAIN: _____

WERE THERE ANY DEVIATIONS REPORTED IN THE MEASURING AND/OR MIXING OF INGREDIENTS? (YES) (NO)
EXPLAIN: _____

DOES THE ESTABLISHMENT ROUTINELY USE METAL DETECTORS OR OTHER VISUAL IMAGING DEVICES? (YES) (NO)
EXPLAIN: _____

WERE OTHER PRODUCTS PRODUCED ON THE SAME LINE OR USING SOME OF THE SAME EQUIPMENT DURING THE "CLEAN-UP
TO CLEAN-UP" PERIOD? (YES) (NO) EXPLAIN: _____

How to Develop A Recall Plan



RECALL WORKSHEET (*Listeria monocytogenes* ATTACHMENT) (READY-TO-EAT PRODUCT)

DESCRIBE THE PRODUCTION/PROCESSING OPERATION AND/OR ATTACH A PROCESS FLOW DIAGRAM: _____

WHAT WERE THE "CLEAN-UP TO CLEAN-UP" TIMES? _____

WAS CARRYOVER PRODUCT FROM PREVIOUS PRODUCTION PACKED WITH THIS PACKAGING CODE? (YES) (NO)

WAS THERE A COMPLETE LINE CLEAN-UP AFTER THE CARRYOVER WAS RUN? (YES) (NO)

WHAT DATE WAS THE CARRYOVER PRODUCT CARRIED OVER FROM? _____

WERE THERE ANY PROCESS DEVIATIONS DURING THE PRODUCTION OF THE CARRYOVER PRODUCT? (YES) (NO)

EXPLAIN: _____

WHAT WAS/WERE THE CORRECTIVE ACTION(S)? _____

WERE OTHER PRODUCTS PRODUCED ON THE SAME LINE OR USING SOME OF THE SAME EQUIPMENT DURING THE "CLEAN-UP TO CLEAN-UP" PERIOD? (YES) (NO) EXPLAIN: _____

WHAT INTERNAL COOK TEMPERATURE WAS REACHED? _____

DID THE PRODUCT REACH ANY SPECIFIED A_w OR pH REQUIREMENT? (YES) (NO) SPECIFY: _____

DOES THE FIRM HAVE AN IN-PLANT ENVIRONMENTAL MONITORING PROGRAM FOR *Listeria monocytogenes*? (YES) (NO)

WAS THE SOURCE OF THE CONTAMINATION IDENTIFIED? (YES) (NO)

EXPLAIN: _____

IS THERE DATA THAT COULD LIMIT THE AMOUNT OF PRODUCT AFFECTED? (YES) (NO) EXPLAIN: _____



How to Develop A Recall Plan

RECALL WORKSHEET

(*E. coli* 0157:H7 ATTACHMENT)

DESCRIBE THE PRODUCTION/PROCESSING OPERATION AND/OR ATTACH A PROCESS FLOW DIAGRAM: _____

DOES THE ESTABLISHMENT CONDUCT *E. coli* 0157:H7 TESTING? (YES) (NO) WHAT FREQUENCY?

WHAT WAS/WERE THE SOURCE(S) OF THE MATERIALS PROCESSED? _____

WERE OTHER PRODUCTS PRODUCED FROM THE SOURCE MATERIALS? (YES) (NO)

EXPLAIN: _____

WAS REWORK OR CARRYOVER FROM THIS PRODUCT USED IN FUTURE PRODUCTION? (YES) (NO)

IF YES, ON WHAT DATES WERE THE REWORK OR CARRYOVER USED AND WAS THERE ANY REWORK OR CARRYOVER FROM THAT DAY'S PRODUCTION USED IN FUTURE PRODUCTION?

WHAT WERE THE "CLEAN-UP TO CLEAN-UP" TIMES? _____

WERE OTHER PRODUCTS PRODUCED ON THE SAME LINE OR USING SOME OF THE SAME EQUIPMENT DURING THE "CLEAN-UP TO CLEAN-UP" PERIOD? (YES) (NO) EXPLAIN: _____

WAS ANY MICROBIOLOGICAL TESTING PERFORMED BY THE COMPANY? (YES) (NO) EXPLAIN, INCLUDE RESULTS: _____

ARE THERE DATA THAT COULD LIMIT THE AMOUNT OF PRODUCT AFFECTED? (YES) (NO) _____

WERE THERE ANY PROCESS DEVIATIONS DURING THE PRODUCTION OF THE AFFECTED PRODUCT? (YES) (NO)

WHAT WAS/WERE THE CORRECTIVE ACTION(S)? _____

How to Develop A Recall Plan



RECALL WORKSHEET (*Salmonella* sp. ATTACHMENT) (READY-TO-EAT PRODUCT)

DESCRIBE THE PRODUCTION/PROCESSING OPERATION AND/OR ATTACH A PROCESS FLOW DIAGRAM: _____

WHAT WERE THE "CLEAN-UP TO CLEAN-UP" TIMES? _____

WAS CARRYOVER PRODUCT FROM PREVIOUS PRODUCTION PACKED WITH THIS CODE? (YES) (NO)

WAS THERE A LINE CLEAN-UP AFTER THE CARRYOVER WAS RUN? (YES) (NO)

WHAT DATE WAS THE CARRYOVER PRODUCT CARRIED OVER FROM? _____

WERE THERE ANY PROCESS DEVIATIONS DURING THE PRODUCTION OF THE CARRYOVER PRODUCT? (YES) (NO)

EXPLAIN: _____

WHAT WAS/WERE THE CORRECTIVE ACTION(S)? _____

WERE OTHER PRODUCTS PRODUCED ON THE SAME LINE OR USING SOME OF THE SAME EQUIPMENT DURING THE "CLEAN-UP TO CLEAN-UP" PERIOD? (YES) (NO) EXPLAIN: _____

WHAT INTERNAL COOK TEMPERATURE WAS REACHED? _____

DID THE PRODUCT REACH ANY SPECIFIED Aw OR pH REQUIREMENT? (YES) (NO) SPECIFY: _____

DOES THE ESTABLISHMENT HAVE POST-PROCESSING CONTROLS? (YES) (NO) SPECIFY (include records): _____

WAS ANY MICROBIOLOGICAL TESTING PERFORMED BY THE COMPANY? (YES) (NO) EXPLAIN, INCLUDE RESULTS: _____

IS THERE DATA THAT COULD LIMIT THE AMOUNT OF PRODUCT AFFECTED? (YES) (NO) EXPLAIN: _____

A Sample MEAT AND POULTRY PRODUCT Recall Plan: THE WORKBOOK



U.S. Department of Agriculture
Food Safety and Inspection Service

May 2013

A Sample Meat and Poultry Product Recall Plan: The Workbook

A Supplement to the *Small Plant News* Guidebook on How to Develop a Meat and Poultry Product Recall Plan

The article titled “How You Can Prevent Recalls” in the Volume 2, Number 3 issue of *Small Plant News* featured a fictitious individual and company – Hermann Q. Fuerschlinger, owner of Fuerschlinger’s Better Meat Company, to illustrate the importance of recall preparation. A recall plan, which companies are now required to have, enables efficient preparation and prompt action that can limit the scope of a recall.

To help you formulate your own plan, *Small Plant News* has developed this two-part supplement “How to Develop a Meat and Poultry Product Recall Plan: The Workbook.” Part I features the fictitious entity, Fuerschlinger’s Better Meat Company, and its recall plan. As a note, the names of individuals listed within this plan are fictitious, and any resemblance to places, names, and people are purely coincidental. Part II is the workbook portion you can use to record, gather, or compile information and begin constructing your own plan.

It’s important to note that no one plan can fit all companies’ needs. This workbook merely serves as a guide to help you get started on this important food safety tool for your own business.

Part I

Fuerschlinger's Better Meat Company Meat and Poultry Product Recall Plan

September 15, 2012

Approved by: Hermann Q. Fuerschlinger, Owner



Introduction

The Fuerschlinger's Better Meat Company Meat and Poultry Product Recall Plan will be reviewed biannually and revised by Fuerschlinger's Better Meat Company, as necessary, when personnel, procedures, processes, or other factors change.

Identification of Recall Personnel (Recall Committee)

Sally Fuerschlinger (Primary Recall Coordinator),
Tel: (123) 456-7890, Fax: (123) 456-7890,
E-mail: Sfuerschlinger@FuerschlingersBetterMeat.com

Ralph Staff (Alternate Recall Coordinator),
Tel: (123) 456-7890, Fax: (123) 456-7890,
E-mail: Rstaff@FuerschlingersBetterMeat.com

Alexandra Jones (Consumer Representative),
Tel: (123) 456-7890, Fax: (123) 456-7890,
E-mail: AJones@FuerschlingersBetterMeat.com

Jeff Fuerschlinger (Public Affairs Representative),
Tel: (123) 456-7890, Fax: (123) 456-7890,
E-mail: Jfuerschlinger@FuerschlingersBetterMeat.com

Herman Q. Fuerschlinger (Owner), Tel: (123) 456-7890,
Fax: (123) 456-7890, E-mail: Hfuerschlinger@FuerschlingersBetterMeat.com

Determining Whether a Recall is Necessary

The Fuerschlinger's Better Meat Company will collect and analyze all information and data it has regarding product that may be recalled. It will take into account the following factors:

- Has adulterated or misbranded product been produced?
- Has adulterated or misbranded product been shipped?
- Where has the product been shipped?
- Is the product in commerce?
- Is the product available to consumers?



Scope of Recall

Fuerschlinger's Better Meat Company will assess the amount and type of product that is implicated in a recall. When the problem involves contamination with microbial pathogens, the recall should include all products produced under a single Hazard Analysis and Critical Control Point (HACCP) plan between performance of complete cleaning and sanitizing procedures. However, the act of sanitation does not necessarily define the scope of all product removal actions. For instance, with *E. coli* O157:H7, the company will also consider the use of source materials.

Some examples of how to define the scope of product removal actions include:

- Contamination of a vat of product with a foreign material;
- Use of an incorrect label; or
- Use of the same source of raw materials, in other lots, on other days of production.

In addition, the Fuerschlinger's Better Meat Company will consider such factors as:

- Coding of product;
- Pathogen of concern;
- Processing and packaging;
- Equipment;
- Our HACCP plan monitoring and verification activities (including microbiological testing);
- Our Sanitation Standard Operating Procedure (SSOP) records; and
- Whether some or all of the products controlled by the same or substantially similar HACCP plans have been affected.

The plan will specify how the company will determine the scope of the implicated product for various scenarios and contingencies.



Records

Company records are maintained in our office at 123 Brown Rd., Springfield, OH 12345. They are kept for a period of time that exceeds the shelf-life and expected use of our products and in accordance with FSIS regulations 9 CFR 320 and 9 CFR 381.175, and contain the following information:

- Positive identification of products;
- Distribution records (e.g., bills of sale, invoices, shipping papers, etc.); and
- Production records that facilitate traceback of products and product ingredients.

All of our records include the names and addresses of consignees, shipment methods, and dates of shipment. In addition, we maintain records of all of our suppliers of ground beef (e.g., names and lot numbers of suppliers, and production dates) in accordance with FSIS Directive 10,010.1.





Depth of Recall

The Fuerschlinger's Better Meat Company Recall Committee has developed a number of scenarios to determine the depth of the recall. Since they are proprietary designs, they are maintained in our office at 123 Brown Rd., Springfield, OH 12345. In the event of a recall, they will be made available to regulatory agencies upon request. The depth of a recall depends on the degree of hazard, the extent of distribution, and the level to which the recalled product was distributed. Levels of recall depth are categorized as:

- Wholesale level: Product has been distributed to a warehouse or distribution center where it is not under the direct control of the producing company.
- Retail level: Product has been received by retailers for sale to household consumers.
- HRI level: Product has been received by hotels, restaurants, and institutional (HRI) customers.
- Consumer level: Product has been sold to consumers.

Recall Communications

We, at Fuerschlinger's Better Meat Company, consider the health and safety of our employees and the public our highest priority. As such, we have developed various communication methods to inform suppliers, consignees, and consumers about any product recalls we may be involved in. Please see the recall communication templates on pages 38-41.

All of our communications will convey the following information:

- If the product is subject to recall;
- If further distribution or use of any remaining product should cease immediately;



- If the direct consignee should, in turn, notify its consignees that received the product about the recall;
- Instructions on what to do with the product; and
- Our contact information (point of contact and telephone number).

Recall Communication Implementation

Fuerschlinger's Better Meat Company will attempt to contact all consignees or customers via the following methods (in this particular order) until a point of contact receives and acknowledges our communication:

- Telephone;
- E-mail; and
- Fax.

In addition, all consignees or customers shall be contacted via special delivery letters conspicuously marked (on the letter or envelope) "URGENT – FOOD RECALL." Follow-up communications shall be sent to consignees or customers who fail to respond to initial recall communications within 24 hours.



Recall Communication Content

All recall communications will be written in accordance with the following guidelines:

- Be brief and to the point;
- Clearly identify the product and any other pertinent, descriptive information including:
 - Product/brand name;
 - Product code;
 - Package/case size;
 - Package/case date code;
 - Lot number/expiration date; and
 - Universal Product Code (UPC).
- Describe the risk involved in consuming the product;
- Concisely explain the reason for the recall and the hazard involved;
- Provide specific instructions on what should be done with the recalled product;
- Request an official, written statement from consignees;
- Provide a means for consignees (and other communication recipients) to report whether or not they have any of the product under their control; and
- Include our company's contact information and a point of contact.



Responsibility of Recipient

Consignees or customers who receive a recall communication should immediately carry out all instructions provided and, where necessary, extend the recall to their consignees or customers.

Public Notification

The class of a recall and the extent to which the product was distributed in commerce will determine the distribution of public notification by FSIS. Fuerschlinger's Better Meat Company will decide if the company will issue its own press release in addition to the Recall Release or Recall Notification Report issued by FSIS and how it will be issued. Public notification templates may be found on Pages 38-41.

Effectiveness Checks

In an effort to assess the progress and effectiveness of a recall, FSIS will conduct effectiveness checks to verify that all consignees (at the determined recall depth) have received notification about the recall and have taken appropriate action.

Regardless of the recall scenario, all consignees will be contacted via the following methods (in this particular order) until we receive written acknowledgment from them:

- Telephone call;
- E-mail or Fax;
- Special delivery letters; and
- Personal visit.



A Sample Recall Plan: *The Workbook*

Fuerschlinger's Better Meat Company will consider the following information in regards to the recall effectiveness check process:

- How much product is implicated in the recall?
- How is the product identified to our customers/retailers (e.g., lot markings)?
- How many locations did we ship the product to and where are they?
- How did we communicate the product removal action to those who received it?
 - Did we document this contact?
 - Did we ask for and receive written acknowledgment from them?
- What actions were taken with the product and by whom?
- If product was destroyed, then was destruction witnessed and documented?
 - Were FSIS inspection program personnel present?
- Is there a written record of:
 - When the issue was identified?
 - When customers were notified?
 - When we received notification that the product was either placed on hold or was no longer in a customer's control?
- Can we account for most (or all) of the product?



Returned Product Control and Disposition

Fuerschlinger's Better Meat Company will specify how the recalled product will be disposed of and how it will be controlled pending disposition. FSIS should be notified prior to disposition actions, which may include destruction or relabeling of product that is returned. If the product is destroyed, it will be rendered inedible for humans and animals. All labeling will be made unusable for trade.





Recall Simulations

Fuerschlinger's Better Meat Company will conduct biannual simulation exercises to evaluate our recall plan. The simulated recall will involve the selection, without prior notice to personnel involved in the exercise, of at least one product lot that has been distributed in commerce.

A hypothetical reason for recalling the product will be specified and will involve the activation of the recall plan. The simulation will proceed at least to the point at which communication is made beyond the firm's organizational limits (full details of who will be contacted and how this will be established will be specified prior to the start of the exercise).

In addition, the recall simulation exercises will include scenarios in which the recalled product has been shipped beyond the firm's initial customer to one or more of the consignee's customers.

A recall simulation file is maintained by Fuerschlinger's Better Meat Company to record the details and results of all simulated recall exercises. It includes the following information:

- Name, address and telephone number of clients (of the test lot);
- Production records;
- Inventory; and
- Distribution of the test lot.

If problems are identified during a recall simulation exercise, our recall plan (and procedures) will be revised as necessary.

The Fuerschlinger's Better Meat Company Recall Plan will be reviewed biannually and revised as necessary, when personnel, procedures, processes, and other factors change.

Recall Communication Templates

The enclosed recall communication templates on pages 38-41 will be used by the company to develop Letters to Customers and Press Releases relating to recalled product(s) during actual recalls and simulation exercises.



RECALL COMMUNICATION TEMPLATE #1

Letter to Customers

DATE

CUSTOMER FIRM NAME & ADDRESS

ATTN: **CONTACT PERSON NAME & TITLE**

Re: RECALL OF **TYPE OF PRODUCT**

Dear Sir or Madam:

This letter is to confirm our telephone conversation that Fuerschlinger's Better Meat Company is recalling the following product because **Specify Recall Reason:**

Describe the product, including name, brand, code, package size and type, establishment number, etc.

We request that you review your inventory records and segregate and hold the above product. If you have shipped any of this product, then we request that you contact your customers and ask them to retrieve the product and return it to you. Once you have retrieved all of the product, please contact us. We will arrange to have the product shipped to our facility. Please do not destroy the product. We will credit your account for returned products.

We are undertaking this action in cooperation with the U.S. Department of Agriculture, Food Safety and Inspection Service (FSIS). FSIS officials may contact you to confirm that you have received this notice and are cooperating in this action.

Your prompt action will greatly assist Fuerschlinger's Better Meat Company in this recall. If you have any questions, please do not hesitate to contact Sally Fuerschlinger at (123) 456-7890.

Thank you for your cooperation.

Sincerely,

Hermann Q. Fuerschlinger, Owner



RECALL COMMUNICATION TEMPLATE #2

Company Press Release

FUERSCHLINGER'S BETTER MEAT COMPANY RECALLS [PRODUCT] DUE TO POSSIBLE *Listeria* CONTAMINATION

[CITY], [DATE] – Fuerschlinger's Better Meat Company, a Springfield, Ohio, establishment, is recalling approximately [AMOUNT] pounds of [PRODUCT] that may be contaminated with *Listeria monocytogenes*].

The following products are subject to recall:

- [IDENTIFYING INFO: TYPE OF CONTAINER, WEIGHT, "BRAND NAME AND OTHER LABEL INFORMATION," ESTABLISHMENT NUMBER, CASE AND/OR DATE CODES]

The products were produced [DATE] and distributed to [LEVEL OF DISTRIBUTION I.E. RETAIL ESTABLISHMENTS, INSTITUTIONS, ETC] in [STATES].

The problem was discovered through [SPECIFY HOW PROBLEM WAS DISCOVERED]. There have been [# or NONE] reports of illness associated with consumption of these products.

Consumption of food contaminated with *Listeria monocytogenes* can cause listeriosis, an uncommon but potentially fatal disease. Healthy people rarely contract listeriosis. However, listeriosis can cause miscarriages and stillbirths, and can also cause serious and sometimes fatal infections in those with weak immune systems, such as infants, the elderly, persons with human immunodeficiency virus (HIV) infection, or those undergoing chemotherapy. Infection can spread to the nervous system, resulting in high fever, severe headache, neck stiffness, nausea, confusion and convulsions.

Consumers with questions about the recall may contact the Fuerschlinger's Better Meat Company Consumer Representative, Alexandra Jones, at (123) 456-7890. Media with questions about the recall may contact the Fuerschlinger's Better Meat Company Public Affairs Representative, Jeff Fuerschlinger, at (123) 456-7890.



RECALL COMMUNICATION TEMPLATE #3

Company Press Release

FUERSCHLINGER'S BETTER MEAT COMPANY RECALLS [PRODUCT] DUE TO UNDECLARED ALLERGEN

[CITY], [DATE] – Fuerschlinger's Better Meat Company, a Springfield, Ohio, establishment, is recalling approximately [AMOUNT] pounds of [PRODUCT] due to an undeclared allergen [SPECIFY ALLERGEN].

The following products are subject to recall:

- [IDENTIFYING INFO: TYPE OF CONTAINER, WEIGHT, "BRAND NAME AND OTHER LABEL INFORMATION," ESTABLISHMENT NUMBER, CASE AND/OR DATE CODES]

The products were produced [DATE] and distributed to [LEVEL OF DISTRIBUTION I.E., RETAIL ESTABLISHMENTS, INSTITUTIONS, ETC.] in [STATES].

The problem was discovered through [SPECIFY HOW PROBLEM WAS DISCOVERED]. Anyone concerned about an allergic reaction should contact a physician.

Consumers with questions about the recall may contact the Fuerschlinger's Better Meat Company Consumer Representative, Alexandra Jones at (123) 456-7890. Media with questions about the recall may contact the Fuerschlinger's Better Meat Company Public Affairs Representative, Jeff Fuerschlinger at (123) 456-7890.



RECALL COMMUNICATION TEMPLATE #4

Company Press Release

FUERSCHLINGER'S BETTER MEAT COMPANY RECALLS [PRODUCT] THAT MAY CONTAIN [GLASS, PLASTIC, ETC.]

[CITY], [DATE] – Fuerschlinger's Better Meat Company, a Springfield, Ohio, establishment, is recalling approximately [AMOUNT] pounds of [PRODUCT] that may contain pieces of [SPECIFY MATERIAL].

The following products are subject to recall:

- [IDENTIFYING INFO: TYPE OF CONTAINER, WEIGHT, "BRAND NAME AND OTHER LABEL INFORMATION," ESTABLISHMENT NUMBER, CASE AND/OR DATE CODES]

The products were produced [DATE] and distributed to [LEVEL OF DISTRIBUTION I.E. RETAIL ESTABLISHMENTS, INSTITUTIONS, ETC] in [STATES].

The problem was discovered through [SPECIFY HOW PROBLEM WAS DISCOVERED]. There have been [# or NONE] reports of injury from consumption of these products. Anyone concerned about an injury from consumption of the products should contact a physician.

Consumers with questions about the recall may contact the Fuerschlinger's Better Meat Company Consumer Representative, Alexandra Jones, at (123) 456-7890. Media with questions about the recall may contact the Fuerschlinger's Better Meat Company Public Affairs Representative, Jeff Fuerschlinger, at (123) 456-7890.



Part II

The Workbook

RECALL PLAN

Establishment name: _____

Establishment location: _____

FSIS establishment number: _____

Date: _____



A Sample Recall Plan: *The Workbook*

Recall Coordinator (person responsible for coordinating recalls at this firm):

Name: _____

Phone: _____

Fax: _____

E-mail: _____

Recall Team/Contacts

Name	Contact information (company, address, phone number, fax number, e-mail address)	Role (in plant, supplier, distributor, customer, District Office)



Procedures for Determining a Recall

Health Hazard Evaluation

- Is there an undeclared allergen in the plant's product?

Yes No

If yes, describe the details. _____

- Was product underprocessed?

Yes No

If yes, describe the details. _____

- Has product tested positive for a pathogen?

Yes No

If yes, describe the details. _____

- Are there reports of disease or injury occurring due to product?

Yes No

If yes, describe the details. _____



A Sample Recall Plan: *The Workbook*

- How did the plant receive word of a problem with the product?

- How serious is the hazard?

- Are some groups at more risk to the hazard in the product?

- Other details:



Records

What system of records will be used to manage and track the recall?

- Product identification, product coding, product lots**
- Distribution records**
- Consignee records**

Other details related to records:

Include a copy of all records used for this recall as an Appendix to this plan.

Recall Depth

Check all levels that the recall includes.

- Wholesale (warehouse, storage)**
- Retail**
- Hotels, restaurants, and institutions**
- Consumer**
- Other (describe) _____**



Recall Notice (See sample of Recall Notice in Guidebook.)

Include a copy of the Recall Notice used as an Appendix to this plan.

Recall Notice Tracking

The Recall Notice was issued to the following companies or individuals. (Include all records, such as fax received receipts, copies of e-mail responses, etc.)

Notice sent to (company/ individual name)	Method used to send the Notice	Date the Notice was sent	Date response was received indicating a response from company/ individual	Directions in the Notice were followed?
	Phone Fax E-mail Other			Yes No



Record of Returned Product and Product Disposition

Company returning product	Product description (lot, condition)	Date returned product was received	Who received the product	Product disposition	FSIS contacted?

Date of last recall simulation:



United States
Department of
Agriculture
Food Safety and
Inspection Service

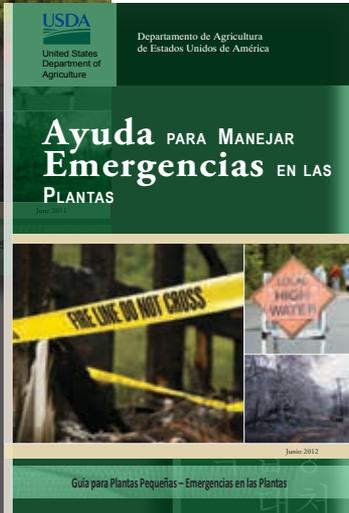
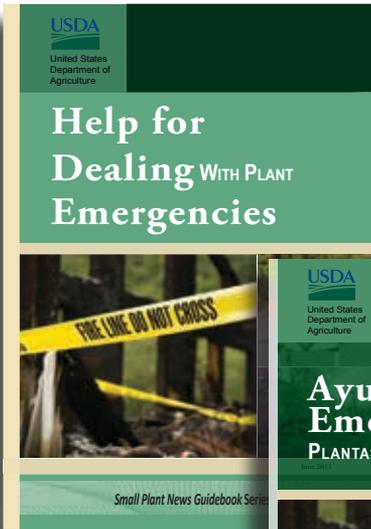
Introduction TO THE Microbiology OF Food Processing



August 2012

Small Plant News Guidebook Series

To access the Introduction to Microbiology of Food Processing guidebook, go to http://www.fsis.usda.gov/News_&_Events/Small_Plant_News/index.asp.



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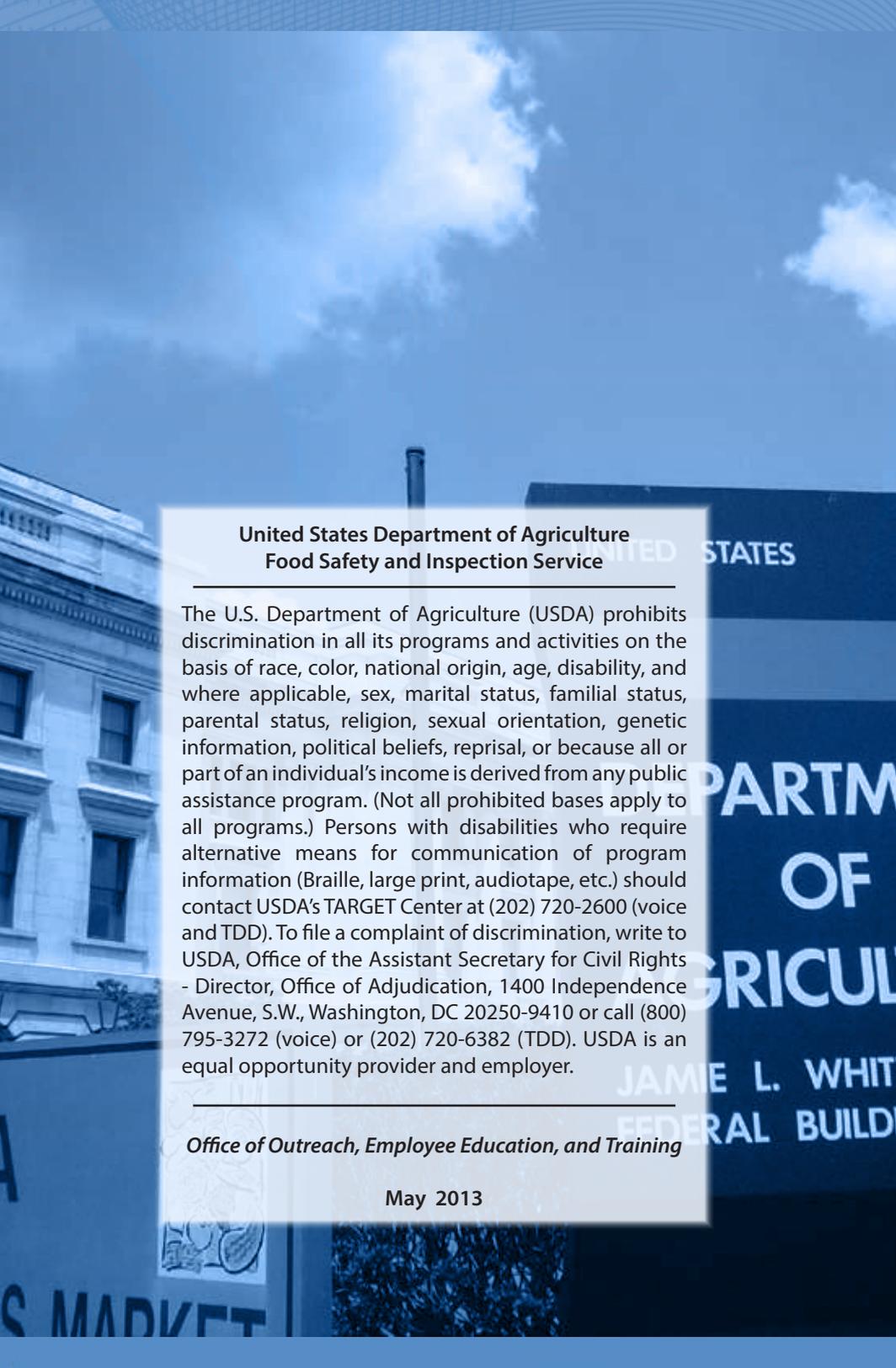


The Small Plant Help Desk

A resource for small and very small plants

**Call Toll-free 1-877-FSISHelp
(1-877-374-7435).**

Knowledgeable USDA-FSIS specialists from the Outreach and Partnership office are available weekdays 8:00 AM to 4:00 PM EST to give you personal assistance on matters relating to the regulation of meat, poultry, and processed egg products. Or e-mail questions to InfoSource@fsis.usda.gov.



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